

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: SHOP-VAC MARKETING
AND SALES PRACTICES
LITIGATION

THIS DOCUMENT RELATES TO:
All Cases

MDL No. 2380

Civil Action No. 4:12-md-02380-YK

(Chief Judge Yvette Kane)

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS
SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS,
APPOINTMENT OF CLASS REPRESENTATIVES AND CLASS
COUNSEL, AND PLAINTIFFS' APPLICATION FOR AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND
SERVICE AWARDS TO CLASS REPRESENTATIVES**

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs Andrew Harbut, Alan McMichael, Kris Reid, David Palomino, and Scott Giannetti hereby move this Court for an entry of Order: (1) granting final approval of the Settlement; (2) granting certification of a nationwide Settlement Class; (3) appointing Andrew Harbut, Alan McMichael, Kris Reid, David Palomino, and Scott Giannetti as representatives of the Settlement Class, and the law firm Dilworth Paxson LLP as Liaison Counsel and the law firms Faruqi & Faruqi, LLP, Lax LLP, Lite DePalma Greenberg, LLC, and Milberg LLP as Class Counsel for the Settlement Class; and (4) granting an award of attorneys' fees, expenses and service awards in the sum of \$4,250,000. A copy of the proposed order is attached for the Court's convenience.

The Motion is based on the accompanying memorandum of law in support thereof, the Declaration of Robert I. Lax in Support of the Motion for Final Approval of the Proposed Settlement and Application for an Award of Attorneys' Fees and Reimbursement of Expenses, the Declarations of James J. Rodgers, Adam R. Gonnelli, Bruce D. Greenberg, Sanford P. Dumain, Robert I. Lax, Jon Herskowitz, William J. Pinilis, Michael R. Reese, and Bonner C. Walsh, with annexed exhibits, and the Declarations of Andrew Harbut, Alan McMichael, Kris Reid, David Palomino, and Scott Giannetti, as well as any additional written or oral submissions this Court may request or require.

Dated: July 25, 2016

Respectfully Submitted,

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